

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*In re Valsartan, Losartan, and Irbesartan  
Products Liability Litigation*

*Case No. 19-md-2875*

**NOTICE OF VIDEOTAPED DEPOSITION OF  
JAMES LAWSON**

**PLEASE TAKE NOTICE** that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendant Mylan Pharmaceuticals Inc. will take the deposition upon oral examination of James Lawson, on **December 6, 2021 at 8:00 a.m. EDT** each day, and continuing until completion, via remote deposition while the witness is at his home or office or other location agreed to by the parties.

Please take further notice that: the deposition will be conducted remotely, using audiovisual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The court reporter and videographer will be an employee or agent of Veritext Legal

Solutions. Counsel who wish to attend remotely should contact Veritext at [valsartan@veritext.com](mailto:valsartan@veritext.com) to arrange for login credentials to be sent to them prior to the deposition.

The attorney contact for the deposition is:

Frank H. Stoy, Esq.  
Pietragallo Gordon Alfano  
Bosick & Raspanti, LLP  
One Oxford Centre, 38<sup>th</sup> Floor  
Pittsburgh, PA 15219  
(412) 263-4397  
[fhs@pietragallo.com](mailto:fhs@pietragallo.com)

Date: November 24, 2021

Respectfully submitted,

s/ Clem C. Trischler  
Clem C. Trischler, Esq.  
Pietragallo Gordon Alfano Bosick & Raspanti,  
LLP  
One Oxford Centre, 38<sup>th</sup> Floor  
Pittsburgh, PA 15219  
(412) 263-1816  
[cct@pietragallo.com](mailto:cct@pietragallo.com)

*Attorney for Defendant Mylan  
Pharmaceuticals Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Clem C. Trischler

Clem C. Trischler, Esq.  
Pietragallo Gordon Alfano Bosick & Raspanti,  
LLP  
One Oxford Centre, 38<sup>th</sup> Floor  
Pittsburgh, PA 15219  
(412) 263-1816

*Attorney for Defendant Mylan  
Pharmaceuticals Inc.*